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*Attorneys for Defendants Restoration of America, Inc.*  
*and Voter Reference Foundation LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, *as assignee of*  
*individuals who are Covered Persons,*  
JANE DOE-1, *a law enforcement*  
*officer,* JANE DOE-2, *a law*  
*enforcement officer,* EDWIN  
MALDONADO, SCOTT MALONEY,  
JUSTYNA MALONEY, PATRICK  
COLLIGAN, and WILLIAM  
SULLIVAN,

Plaintiffs,

v.

RESTORATION OF AMERICA,  
VOTER REFERENCE FOUNDATION  
LLC, RICHARD ROES 1-10, *fictitious*  
*names of unknown individuals* and ABC  
COMPANIES 1-10, *fictitious names of*  
*unknown entities,*

Defendants.

(Electronically Filed)

CIVIL ACTION

Civil Action No. 1:24-cv-4324

**NOTICE OF MOTION TO DISMISS THE COMPLAINT  
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

**To:** Rajiv D. Parikh, Esq.  
PEM LAW LLP  
One Boland Drive, Suite 101  
West Orange, NJ 07052  
*Attorneys for Plaintiff*

**PLEASE TAKE NOTICE** that on September 3, 2024, at 10:00 a.m., or as soon thereafter as counsel can be heard, Constangy, Brooks, Smith & Prophete, LLP, attorneys for Defendants, Restoration of America and Voter Reference Foundation, LLC, will move before this Court at the Mitchell H. Cohen Building and U.S. Courthouse located at 4th and Cooper Streets, Camden, New Jersey 08101 for an Order dismissing the Complaint in full, with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6).

**IN SUPPORT** of this motion, Defendants shall rely upon its supporting Memorandum of Law, the Certification of John E. MacDonald, Esq. and annexed exhibits filed therewith. A proposed form of Order is also submitted.

Oral argument is hereby requested.

Dated: June 14, 2024

CONSTANGY, BROOKS, SMITH & PROPHETE LLP

By: /s/ John E. MacDonald

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*Attorneys for Defendants Restoration of America,  
Inc. and Voter Reference Foundation LLC*

**CERTIFICATION OF SERVICE**

I hereby certify that on June 14, 2024 the foregoing was filed electronically. Notice of this filing will be sent to the below listed attorneys of record by operation of the Court's electronic filing system. The parties may access this filing through the Court's system.

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